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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **EASTERN DIVISION**

14 OMAR BOLANOS, individually, and
15 on behalf of all others similarly situated,

16 Plaintiff,

17 vs.

18 CROSSROADS EQUIPMENT LEASE
19 & FINANCE, LLC,

20 Defendant.

21 CAREN LUKE, individually, and on
22 behalf of all others similarly situated,

23 Plaintiff,

24 vs.

CROSSROADS EQUIPMENT LEASE
& FINANCE, LLC,

Defendant.

Case No. 5:24-cv-00552-JGB-SP

**PLAINTIFF'S NOTICE OF
MOTION AND JOINT MOTION
TO CONSOLIDATE**

Date: April 22, 2024

Time: 9:00 a.m. PST

Judge: Jesus G. Bernal

Courtroom: 1, Riverside

Case No. 5:24-cv-00634

NOTICE OF MOTION AND MOTION

Please take notice that on **April 22, 2024**, at **9:00 a.m. PST**, Plaintiffs Omar Bolanos and Caren Luke and Defendant Crossroads Equipment Lease & Finance, LLC will and hereby do move the Court to enter an Order consolidating these two related actions, staying Defendant's deadline to respond to the complaints in the *Luke* and *Bolanos* cases pending the resolution of this Joint Motion to Consolidate, and granting Plaintiffs twenty-one (21) days from the Court's approval of the Joint Motion to Consolidate to file a consolidated complaint. In support of this Motion, the Parties submit herewith a Memorandum of Points and Authorities.

CERTIFICATION OF COUNSEL

Pursuant to Local Rule 7-3, counsel for Plaintiff certifies that they conferred with counsel for Defendant via email on April 9 and 10, 2024.

Date: April 15, 2024

Date: April 15, 2024

Respectfully Submitted,

Respectfully Submitted,

/s/Andrew Gunem

/s/ John S. Purcell

Raina C. Borrelli *

John S. Purcell

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Franjo M. Dolenac

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ARENTFOX SCHIFF

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Counsel for Plaintiff Luke

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2024, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter.

/s/ Andrew Gunem
Andrew Gunem